Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of language in 73.3526(e)(12) regarding "Issues and Programs" listing. This entire concept should be eliminated from the Rules for all Radio and Television Licensees.

This rule states *"The list shall include a brief narrative describing what issues were given significant treatment and the programming that provided this treatment. The description of the programs shall include, but shall not be limited to, the time, date, duration, and title of each program in which the issue was treated."* While there was a time when the ascertainment of community needs and issues was an important task for local radio and television licensees, that was also when there was few, or only one, local signal in a community; competition for listeners was non-existent and a single station could easily fail to meet community needs programming. Those days are long gone, with the radio dial complete in nearly every location, there is a myriad of voices competing to serve a local community. Social media and online sources keep the listener keenly connected to broadcasters; there is never a doubt from one moment to the next what issues are of concern to the community. The time, effort and expense of licensees complying with this useless regulation are an extensive burden on them, and just a point of violation for the FCC to claim at license renewal time.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services